REMARKS

Initially, Applicant notes that the remarks and amendments made in this response are consistent with those presented to the Examiner during the telephone conversation of March 5, 2008.

By this paper, claims 1, 15, 29, 32, 33 and 35 have been amended, claim 34 cancelled, and no claims have been added, such that claims 1-37 remain pending, and of which, claims 1, 15, 29, and 32 are the only independent claims at issue.[1]

The Final Office Action, mailed February 5, 2008, considered and rejected claims 1-8, 10-22, and 24-37. Claims 1-8, 10-22, and 24-37 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Lamb (U.S. Patent No. 6,892,264) in view of Blumenau et al. (U.S. Patent No. 6,295,575). Claims 9 and 23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Lamb in view of Blumenau, further in view of Kuik (U.S. Patent No. 7,165,258).[2]

Applicant's claims are generally directed to embodiments for to providing clients access to devices through a network. Claim 1, for example, recites a method for providing a client system access to one or more of devices through a network provider. In the method, on or more devices that can be accessed locally or over a network are first identified. Then a target is generated that identifies a set of the one or more devices that includes at least one corresponding device identifier, wherein the set of one or more devices is identified based on each of the devices having at least one common group of clients. Client authorization information identified by the network provider is associated with the target identifying the set of the one or more devices. Additionally, only clients having client authorization information associated with the target can access the devices identified by the target through the network provider. Finally, the target is assigned to a port through a protocol-independent port driver at the network provider.

The remaining independent claims are closely related to claim 1. For example, claim 15 recites a computer program product generally corresponding to claim 1, while claim 29 recites a method similar to the method of claim 1, but does not expressly recite an act of assigning the target, but does recite a step for exposing the device to the client. Finally, claim 32 recites a

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[1] Support for the amendments is found throughout the Specification and more particularly on page 20 of the Application as originally filed.

[2] Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

method similar to the method of claim 1, except it is directed specifically to the iSCSI protocol and includes receiving a client computer request and obtaining client authorization to thereby provide the client computer with access to a storage device identified in the target. The distinctions presented with regard to claim 1 are contained within each of the independent claim and the arguments present with regard to claim 1 are therefore applicable to all of the independent and dependent claims.

As noted above, the independent claims were rejected using a combination of references. The first reference, Lamb, is directed to embodiments for an improved Storage Area Network. The improvement is related to plug-n-play storage devices and the generation of a logical identification for the device based on a detected event. The relevant passages describe a host being assigned a logical unit number by the manager.

The second reference cited by the Office Action, Blumenau, purportedly compensates for Lamb's failure to teach or suggest that the set of one or more devices is based on client identity and consisting of only devices to which the client has been assigned and to which the client is to be provided access. Blumenau is directed to embodiments for defining a subset of data storage that each host is allowed to access using vectors. In Blumenau, for each host processor, a list of ranges of storage volumes that the host may access is stored in memory at the host processor.

As previously presented to the Examiner, the cited art of Lamb discloses a traditional Storage Area Network that fails to teach all the limitations present in the amended claims. While Blumenau has been cited as compensating for Lamb, Applicant respectfully submits that Blumenau fails to rectify the shortcoming present in Lamb. As an example, the combination of Lamb and Blumenau art fail to teach the use of "targets" in the manner recited in the claims. Instead, the referenced portions of the cited art describe the general features of a Storage Area Network. Lamb is generally not directed to controlling access to storage devices based on the client's identity. Instead, Lamb assigns storage devices to host computers, and the host computers would then typically control access by the clients. However, Lamb does not describe how the hosts would control client access. Blumenau discusses limiting access by providing a host with a listing of storage volumes that the host may access; however, once again, Blumenau is discussing limiting access to hosts, not the individual clients that can be associated with the host. Even if Blumenau could be read as restricting access to individual clients, as will be shown

below, the manner in which Blumenau restricts access fails to teach or suggest the features embodied in the present claims.

A brief overview of the concept of targets will help illustrate the distinctions between the cited art and the present claims. Targets identify specific groups of devices that have at least one common group of clients assigned to the device. Thus, a target will specify a group of devices, rather than specific clients associated with the device. The only requirement is that there are common clients authorized to use the device. Thus, if it determined that all users belonging to a certain group would have access to all floppy drives, then all floppy drives would be assigned to a target. Then the group can be associated with the target to allow access. Because the clients' usage is assigned as a target, rather than per device access, it is relatively simple to add or remove devices. When a new device is added, rather than assigning an access control list to the device, or adding the device to each of the individual hosts, as is done in Blumenau (see column 11, ll. 27-29), the invention allows an identifier to be added to the target, which then allows all users associated with the target to access the device.

In Blumenau, each host maintains the list of devices that the host has access to rather than having a separate target that identifies a group of devices, of which a client associated with the host would have access to, as taught by the present claims. Furthermore, the list of devices fails to have associated client authorization information and further fails to be limited to a common group of clients authorized to access the device.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at (801) 533-9800.

Dated this 2nd day of May, 2008.

Respectfully submitted,

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